

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

**MEMORANDUM**

4/26/2018

**SUBJECT:** Product Chemistry Review for **SU 393** EPA Reg. No.: **875-ROL**

**FROM:** Joseph Williams Jr., PhD  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**THRU:** Karen P. Hicks, Team Leader  
Chemistry and Toxicology Team  
Product Science Branch  
Antimicrobials Division (7510P)

**TO:** Zeno Bain, PM Team 33 / Aline Heffernan  
Regulatory Management Branch I  
Antimicrobials Division (7510P)

Registrant: Diversey, Inc.  
Action code: A540  
Agency Due Date:  
5/29/2018  
DP No.: 444860  
Submission No.: 1012859  
E-Sub No.: 24902  
Classification: EP  
Process: Integrated  
system  
Pesticide type:  
Antimicrobial

MRID(s):50416301, 50416302, 50416303, 50416328, 50416311,50416329

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
047501	67-63-0	Isopropyl Alcohol	24.75
128929	79-33-4	Lactic Acid	4.99840
069104	53516-76-0	Alkyl (60% C14, 30% C16, 5% C12, 5% C18) dimethyl benzyl ammonium chlorides	0.0025
069154	85409-23-0	Alkyl (68% C12, 32% C14) dimethyl ethylbenzyl ammonium chlorides	0.0025
		Other Ingredients	70.2466
		Total	100%

**I. BACKGROUND**

The Registrant, Diversey, Inc., has submitted an application for pesticide registration for their product: SU 393 EPA Reg. No. 875-ROL.

## II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-27 – Formulator’s Exemption Statement	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-35 – Data Matrix (12/7/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cover letter (12/6/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed CSF BASIC, (11/21/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed CSF ALTERNATE , (11/21/2017)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label, (2/16/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments:		

## III. FINDINGS

### a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Active Ingredients(s)	Nominal		Upper limit	Lower limit	
Isopropyl Alcohol	24.75		25.49	24.01	
Lactic Acid	4.99840		7.000	4.7485	
BTC 2125M	0.00500		0.0055	0.0045	
	YES		NO	N/A	
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
2. Wider certified limits were requested and rationale was accepted.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	

4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### IV. Additional Findings

A 1-year study is in progress for Guideline 830.6317 Storage and Stability. Results for 0,3,6 months are reported. See graphs below

#### V. Conclusion

The Product Science Branch of Antimicrobials Division finds the proposed CSFs for the Basic Formulation, dated 11/21/17 and Alternate Formulation dated 11/21/17 **acceptable**. The OCSPP Guidelines 830 Series for Group A and B chemistry data for SU 393 EPA Reg. No. 875-ROL are **acceptable**. Guideline 830.6317 Storage and Stability is in progress.

**VI. Table A:****Series 830 guidelines – Group A**

OPPTS#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	50416301,50416328
830.1600	Description of materials	Acceptable	50416311, 50416328
830.1620	Description of production process	Acceptable	50416311, 50416328
830.1650	Description of formulation process	Acceptable	50416311, 50416328
830.1670	Discussion of formation of impurities	Acceptable	50416311, 50416328
830.1700	Preliminary analysis	Acceptable	50416303
830.1750	Certified limits	Acceptable	50416311, 50416328
830.1800	Enforcement analytical method	Acceptable	50416301
830.1900	Submittal of samples	Requires upgrading	N/A

**VII. Table B: Series 830 guidelines – Group B**

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6302	Color	Lovibond	Acceptable	50416302
830.6303	Physical state	Liquid	Acceptable	50416302
830.6304	Odor	Alcohol-like	Acceptable	50416302
830.6313	Stability to normal & elevated temperatures, metals & metal ions	The product is not TGA	Not applicable	N/A
830.6314	Oxidation/Reduction	No oxidizer/reducer present	Acceptable	50416302
830.6315	Flammability	31.5 deg C (88.7 deg F)	Acceptable	50416302
830.6316	Explodability	Product does not contain explosive ingredients	Acceptable	50416311
830.6317	Storage stability	1-year study is being conducted. Results for 0,3,6 months are reported. See graphs below.	In progress	50416329
830.6319	Miscibility	Product not mixed with organic solvents	Acceptable	50416311
830.6320	Corrosion characteristics	1-year study is being conducted. Results for 0,3,6 months are reported. At time of reporting there is no evidence of corrosion on lids, liners, seams of container.	In progress	50416329
830.6321	Dielectric breakdown voltage	Product not used near electrical equipment	Acceptable	50416311
830.7000	pH	2.16	Acceptable	50416302
830.7050	UV/Visible absorption	The product is not TGA	Not applicable	50416302
830.7100	Viscosity	2.58 centistokes (Kinematic)	Acceptable	50416302
830.7200	Melting point	Not required for MUP or EP	Not applicable	N/A
830.7220	Boiling point	Not required for MUP or EP	Not applicable	N/A

830.7300	Density/relative	0.9691 g/mL	Acceptable	50416302
830.7370	Dissociation constants in water	Not required for MUP or EP	Not applicable	N/A
830.7520	Particle size	Not required for MUP or EP	Not applicable	N/A
830.7550/ 7560/ 7570	Partition coefficient	Not required for MUP or EP	Not applicable	N/A
830.7840/ 7860	Water solubility	Not required for MUP or EP	Not applicable	N/A
830.7950	Vapor pressure	Not required for MUP or EP	Not applicable	N/A